

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**UNITED STATES OF AMERICA**

**vs.**

**Docket No: 11 CR 1032/PAE**

**MIGUEL STRONG,**

**Defendant.**

\_\_\_\_\_ /

January 26, 2015

**BY ECF**

Hon. Paul A. Englemayer

United States District Court Judge

Southern District of New York

United States Courthouse

40 Foley Square

New York, New York 10007-1312

Re: United States v. Miguel Strong, et. al., 11 CR 1032/PAE

Dear Honorable Court:

I am writing this letter to respectfully request an adjournment of the sentencing hearing for Mr. Miguel Strong which is currently scheduled for January 29, 2015 at 2:15pm. Counsel respectfully requests this Honorable Court to reschedule the sentencing hearing to any of the following dates, February 3<sup>rd</sup>, 6<sup>th</sup>, 26<sup>th</sup> - 28<sup>th</sup> or March 4<sup>th</sup> or 5<sup>th</sup>, or any date thereafter that is most convenient for the Court. I have spoken with the Assistant United States Attorney, Jessica Ortiz, regarding this request and the government consents to the requested adjournment. Counsel also request that the Government be allowed to submit their sentencing submission one week before the date set by this Court for Mr. Strong's sentencing. Mr. Strong consents to this request by the Government.

Counsel respectfully makes this request because of the blizzard that is expected to last from Monday to Wednesday morning. Mr. Strong's family, as well as counsel, may experience severe difficulty in travelling to the courthouse because of the snowstorm which is projected to deposit up to 18 inches of snow, possibly more, upon the tri-state area, and it's after effects. It is counsels' understanding from the Strong family that some of Mr. Strong's relatives have a

distant travel, by vehicle, in order to be present for Mr. Strong's sentencing. This is Mr. Strong's second request for an adjournment.

Should the Court be inclined to grant the request, the parties submit that they are available to the Court at any time, on the above following dates.

Thank you for your consideration herein.

Respectfully Submitted,

/s/ Kafahni Nkrumah ,

KAFAHNI NKRUMAH, Esq.

Counsel for Mr. Strong'

cc: (by ecf)

Ms. Jessica Ortiz

Assistant United States Attorney